

29 December, 2008

To:

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Subject: Comment on Draft Environmental Impact Statement (DEIS) "Honolulu High-capacity transit corridor Project: Issue - Scope of Work reduced in DEIS from scope stipulated in 2006 Notice of Intent

Fact:

The project scope outlined in the 2006 Notice of Intent (NOI) agreement between the Federal Transit Administration and the City and County of Honolulu is violated. The NOI explicitly mentions a fixed guideway from Kapolei to the UH. The DEIS fixed guide way starts well outside Kapolei and ends at Ala Moana Shopping Center. The 34 miles have become 20 miles in the DEIS.

Discussion:

The DEIS reduces the project scope as stated in the Notice of Intent (NOI) dated 7 Dec 2007 reference (a), which states:

"The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City and County of Honolulu to implement transit improvements that potentially include high-capacity transit service in a 25-mile travel corridor between Kapolei and the University of Hawaii at Manoa and Waikiki."

Discussion:

The City's 2006 Alternatives Analysis states that "The primary project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa.

The DEIS covers a fixed guideway route of 20 miles from Kapolei to Ala Moana Center. The Draft Environmental Impact of the fixed guideway is limited to only the 20 miles rather than the full 34 miles from Kalaeloa to Waikiki and UN Manoa.

Conclusion:

The project scope outlined in the 2006 Notice of Intent (NOI) agreement between the Federal Transit Administration and the City and County of Honolulu is violated.

Recommendation:

It is strongly recommended that the project scope contained in the DEIS be expanded to include a rail route to both Waikiki and to UH Manoa.

Respectfully,

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Reference (a):

[Federal Register: December 7, 2005 (Volume 70, Number 234)] [Notices]
[Page 72871-72873] From the Federal Register Online via GPO Access
[wais.access.gpo.gov] [DOCID:fr07de05-137]

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